ILLINOIS ENVIRONMENTAL PROTECTION AGENCY



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217/782-3397 217/782-9143 (TDD)

September 22, 2016

Robert A. Kaplan, Acting Regional Administrator Office of the Regional Administrator, R-19J U. S. Environmental Protection Agency, Region 5 77 West Jackson Boulevard Chicago, Illinois 60604-3507

Re: Redesignation for the Granite City and Chicago Nonattainment Areas for the 2008 Lead National Ambient Air Quality Standard and Withdrawal of Attainment Demonstration

Dear Mr. Kaplan:

The Illinois EPA, on behalf of the State of Illinois, requests that the Granite City and Chicago lead nonattainment areas be redesignated to attainment for the 2008 lead National Ambient Air Quality Standard ("NAAQS"). The Illinois EPA is also submitting the "Maintenance Plan for the Chicago and Granite City Lead Nonattainment Areas for the 2008 Lead Standard" as technical support for the redesignation requests. The redesignation requests for both areas, including the maintenance plan, are submitted as a revision to the State Implementation Plan ("SIP") pursuant to Sections 107(d)(3)(E), 110(a)(2), 175A and 191(a) of the Clean Air Act ("CAA"), and Sections 4 and 10 of the Illinois Environmental Protection Act (415 ILCS 5/4 and 10).

On November 22, 2010, USEPA designated, effective December 31, 2010, the Granite City lead nonattainment area composed of the area bounded by Granite City Township and Venice Township. (75 FR 71033) On November 22, 2011, USEPA designated, effective December 31, 2011, the Chicago lead nonattainment area composed of the area surrounding H. Kramer and Co. Brass and Bronze Foundry bounded by Damen Avenue on the west, Roosevelt Road on the north, the Dan Ryan Expressway on the east, and the Stevenson Expressway on the south. (76 FR 72097) Certified ambient air monitoring data collected by the Illinois EPA in both the Granite City area and the Chicago area demonstrate that these areas are currently meeting the 2008 lead standard, and have been meeting the NAAQS since the 2013-2015 monitoring design period.

The Illinois EPA also requests that the Attainment Demonstration for the 2008 lead NAAQS submitted January 9, 2014, and supplemented June 17, 2014, be withdrawn, except for the state rules that limit lead emissions in the nonattainment areas, and the associated attachments and support documents as listed in the attachment to this letter. These rules were adopted in Title 35 Illinois Administrative Code Part 226 ("35 Ill. Adm. Code Part 226"), with effective date April

21, 2014. These rules are to be considered part of this submittal and included in the SIP as control measures to maintain attainment in the two areas.

Illinois EPA hereby certifies and confirms that these requests meet the requirements for redesignation under Sections 107(d)(3)(E), 110(a)(2), and 191(a) of the CAA for the Granite City and Chicago nonattainment areas for the 2008 lead NAAQS. In support of these redesignation requests, the Illinois EPA submits and includes the following amendments to Illinois' SIP for lead:

- Maintenance Plan for the Chicago and Granite City Lead Nonattainment Areas for the 2008 Lead Standard and
- 35 Ill. Adm. Code Part 226 (submitted previously with Attainment Demonstration).

The Maintenance Plan constitutes a revision of Illinois' SIP for lead. Accordingly, the Illinois EPA held a public comment period and offered an opportunity for a public hearing. The public notice was published in the Illinois Register on July 22, 2016. No comments were received and no hearing was requested.

This SIP revision meets the criteria for completeness pursuant to 40 CFR 51.103 and 40 CFR Part 51, Appendix V, Criteria for Determining the Completeness of Plan Submissions. This request is being submitted by means of the USEPA's electronic eSIP submission system with appropriate documentation regarding the public notice and hearing process and will include the Maintenance Plan.

If there are any questions, please feel free to contact David Bloomberg at 217-524-4949 or via email at David.Bloomberg@illinois.gov.

Cordially,

Alec Messina Acting Director

Attachments

Illinois State Implementation Plan

List of Enclosed Documents

- 1. Maintenance Plan for the Chicago and Granite City Lead Nonattainment Areas for the 2008 Lead Standard.
- 2. Notice of Public Hearing and Comment Period, July 22, 2016.

<u>List of Previous Attachments and Support Documents for the</u> Attainment Demonstration for Lead

(These documents should be included as attachments for this SIP submittal, but were previously submitted.)

January 9, 2014, Submittal:

- 1. Illinois EPA regulatory proposal, dated November 12, 2013, and filed with the Illinois Pollution Control Board ("Board") on November 15, 2013.
- 2. Order of the Board by C.K. Zalewski, accepting the Illinois EPA's regulatory proposal for hearing, granting the Illinois EPA's request for waiver of copy requirements, and ordering the clerk to file the proposal for first notice publication in the *Illinois Register*, November 21, 2013.
- 3. Board Hearing Officer Order, Notice of Hearings, November 21, 2013.
- 4. Letter from Chairman Glosser to Director Adam Pollet of the DCEO regarding request for economic impact study, November 21, 2013.
- 5. Illinois Register Notice of Proposed Rules, 37 Ill. Reg. 19490, December 6, 2013.
- 6. Joint Committee on Administrative Rules ("JCAR") First Notice version for use in creating Second Notice Changes, December 6, 2013.
- 7. Entry of appearance of Keith Harley, Pilsen Environmental Rights and Reform Organization, December 11, 2013.
- 8. Board Certification of Publication I.
- 9. Board Certification of Publication II.
- 10. Prefiled Testimony of Rory Davis of Illinois EPA, December 26, 2013.
- 11. Modeling Information for Granite City Lead Attainment Demonstration.
- 12. Modeling Information for the Chicago-Pilsen Neighborhood Lead Attainment Demonstration.
- 13. Electronic disk of modeling information that includes both the underlying inputs used to perform the modeling and the results of the modeling runs.

June 17, 2014 Submittal:

- 1. Exhibit List from hearing of the Board on January 8, 2014, in Chicago, January 9, 2014.
- 2. Transcript of January 8, 2014, hearing, January 10, 2014.
- 3. Post-Hearing Comments of the Illinois EPA, January 13, 2014.
- 4. Board Hearing Officer Order, cancelling second and third hearings, January 21, 2014.
- 5. Board Certification of Publication III.

- 6. JCAR Request for Analysis of Economic and Budgetary Effects of this Rulemaking, February 11, 2014.
- 7. Proof of Publication, February 13, 2014.
- 8. Opinion and Order of the Board by C.K. Zalewski, Proposed Rule, Second Notice, March 20, 2014.
- 9. JCAR Memorandum, indicating that rulemaking will be considered at JCAR's April 7, 2014, meeting, and that second notice began on March 24, 2014, and ends on May 7, 2014, March 26, 2014.
- 10. JCAR Certification of No Objection to Rulemaking, April 14, 2014.
- 11. JCAR's First Notice Version for use in creating Second Notice Changes for Part 226, April 16, 2014.
- 12. Opinion and Order of the Board by C.K. Zalewski, Adopted Rule, Final Order, April 17, 2014.
- 13. Office of the Illinois Secretary of State, Notice of Adopted Rulemaking, published in Ill. Reg. Vol. 38, Issue 18, page 9521, on May 2, 2014.